

COMPETITIVE PROBLEMS IN THE DRUG INDUSTRY 11837

available and have done so in sufficient detail to enable their competitors to identify flaws in their reports. To my knowledge, the Abbott Company has not made any comparable effort to publicly reveal this type of information relative to its products. Consequently, while the Upjohn Company can be justly faulted for having improperly utilized its scientific data for promotional or other self-serving purposes, Abbott Laboratories -- along with the majority of other drug companies -- can be faulted on at least equally severe grounds for providing little, if any, information to the health professions relative to the performance characteristics of its products.

As pointed out in the Abbott memoranda, use of bioavailability studies -- which have been designed in such a manner as to reflect an inherent bias -- constitutes a "prostitution of the science of bioavailability and does little credit to scientists who allow such distortion to occur." I would also concur with the Abbott staff in their view that shaping bioavailability data in this unscientific and bias manner confuses and unduly influences pharmacists and other health practitioners to whom the information is provided.

As a further example of what in my opinion constitutes improper utilization of bioavailability information, I refer you to the enclosed copies of a news release and product information card (dated February 7, 1975) from the Warner-Lambert Company pertaining to the introduction of a new product by their Softcon Products Division. The product involved is acetazolamide tablets marketed under their trademark name Hydrazol.

In particular, I call your attention to the copy of the product information card which in three separate statements carries the claim "bioequivalent," "branded bioequivalence," and "pharmacologically, Hydrazol is as bioavailable as the standard acetazolamide." Despite these repeated statements of equivalency, the news release which accompanied this product information card carries the statement "...Hydrazol, when measured against a competitive acetazolamide, produces higher mean plasma levels during the first two hours after administration." Obviously, the Warner-Lambert Company is contradicting itself in a self-serving effort to have the best of both worlds: in one place they say their product is equal to the competition in an effort to influence purchasers who are looking for equivalent performance. But at the same time, they are also claiming superior performance -- which obviously cannot be "equivalent" -- for their product in an effort to persuade purchasers who may be seeking a product with a higher performance level. In my opinion, this constitutes another example of what the Abbott memoranda referred to as prostitution of the science of bioavailability for promotion purposes.